

Attorney Docket No.: 40146/25701 (1268)

## REMARKS

### I. INTRODUCTION

Claims 1 and 14 have been amended. Claims 3, 4, 6 and 7 have been canceled. Claims 2 and 5 were previously canceled. Thus, claims 1 and 8-14 are now pending in the present application. No new matter has been added. In view of the above amendments and following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

### II. THE 35 U.S.C. § 102(b) REJECTION SHOULD BE WITHDRAWN

Claims 1-4, and 6 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Publication No. 2005/0032531 to Gong et al. (hereinafter "Gong"). (See 12/10/07 Office Action, p. 2).

Claim 1 has been amended to recite "said selected pattern shapes include horizontally offset *non-intersecting* directional antenna patterns."

Gong generally relates to systems and methods which provide for location positioning in wireless networks. (See Gong, Abstract). Specifically, the system is a processor-based system coupled to a plurality of APs via a network backbone, wherein the APs provide RF illumination of a service area using multiple antenna patterns. (See *Id.*, ¶ [0027-0028]). The APs are illustrated as each having 10 directional antenna patterns and one omni-directional antenna pattern associated therewith. (See *Id.*, ¶ [0029]; and Fig. 1A). Furthermore, as illustrated in Fig. 1A, the three APs of the system are arranged in a triangular pattern, wherein portions of the respective antenna patterns of the APs overlap at various angles with each other.

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(See Id., Fig. 1A). While the Gong disclosure states that the system is not limited to the illustrated embodiment of Fig. 1A, the only other embodiment disclosed by Gong includes an AP having a coverage radius of less than 360 degrees. (See Id., ¶ [0030]). Accordingly, several antenna patterns from the APs will intersect with one another, converging at multiple locations. It is important to note that while Gong discloses variation in the coverage radius of the APs, Gong fails to explicitly teach or suggest antenna patterns with “selected pattern shapes include horizontally offset *non-intersecting* directional antenna patterns,” as recited in claim 1.

Thus, it is respectfully submitted that for at least the reasons stated above, currently amended claim 1 of the present application is not anticipated by Gong, and request that the rejection of this claim be withdrawn.

### III. THE 35 U.S.C. § 103(a) REJECTION SHOULD BE WITHDRAWN

Claims 8-11 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Gong. (See 12/10/07 Office Action, p. 4). As discussed above, Gong fails to teach or suggest all the limitations of amended independent claim 1. Because dependent claims 8-11 depend from, and, therefore include all the limitations of independent claim 1, it is respectfully submitted that these claims are allowable for the reasons stated above with reference to claim 1.

Claims 12 and 13 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 7,072,669 to Duckworth in view of U.S. Patent No. 5,406,275 to Hassett et al. (hereinafter “Hassett”). (See 12/10/07 Office Action, p. 5).

Duckworth discloses systems and methods for localizing a position of a wireless device using a plurality of coordinated directional or adaptive antennas to detect signals from the wireless device. The time of arrival of the signal and the angle of arrival at each antenna are

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used in the location estimator to calculate the position of the wireless device. (See Duckworth, abstract). The antenna pattern of each antenna has a substantially star pattern with a central lobe and side lobes. (See Id., col. 4, ll. 24-29; Fig. 2).

Hassett discloses methods and apparatuses for determining a location of a mobile vehicle relative to a radio transceiver. The apparatuses incorporate a mobile transceiver that calculates its location relative to at least a first stationary transceiver and communicates this location back to the stationary transceiver. (See Hassett, abstract). An antenna field pattern of a lane transmitter unit is produced by a phased array radar system. (See Id., col. 4, ll. 21-39; Fig. 2).

As discussed above, claim 1 has been amended to recite "said selected pattern shapes include horizontally offset non-intersecting directional antenna patterns." It is respectfully submitted that neither Duckworth nor Hassett disclose or suggest this recitation of claim 1. Specifically, Duckworth includes antenna patterns that are not horizontally offset and are intersecting (the antenna configuration results in an inevitable pattern intersection). (See Duckworth, Figs. 1-2). Hassett includes antenna patterns that are not horizontally offset. (See Hassett, Fig. 1). Thus, it is respectfully submitted that neither Duckworth nor Hassett, either alone or in combination, discloses or suggests the above recitation of claim 1. Because claims 12 and 13 depend from and, therefore, include all the limitations of claim 1, it is respectfully submitted that these claims are also allowable for the reasons stated above with reference to claim 1.

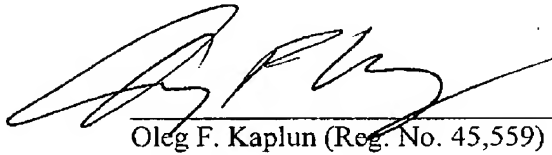
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CONCLUSION

In light of the foregoing, the Applicant respectfully submits that all of the now pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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